JUSTIFICATION FOR SOLE SOURCE (Simplified Acquisitions <$150K)

The service listed on N68836-16-T-0150 is sole source and competition is precluded for reasons indicated below. There are no substitutes available for this service.

Restricted to the following source. Provide *original manufacturer's* name. (If a sole source manufacturer distributes via dealers, *ALSO* provide dealer information.)

Manufacturer: FULL ARMOR GROUP, INC.

Manufacturer POC & PHONE NR: MS. BETTY POE - PHONE NUMBER: 210-379-5110

Mfr. address 310 S SAINT MARYS ST STE 1222 SAN ANTONIO, TX 78205-3113

Dealer / Rep _____

Dealer / Rep address / phone nr. _____

_____

__X__ Description of the service required, the estimated cost, and required delivery date.

Contract N68836-13-C-0087 provides Professional Facilitators to assist with the Chaplain Religious Enrichment Development Operation (CREDO) Southeast programs at Naval Station Mayport, FL; Naval Air Station Jacksonville, FL; Naval Submarine Base, Kings Bay, GA; Naval Air Station Pensacola, FL; Naval Construction Battalion Center, Gulfport, MS; Naval Air Station Corpus Christi, TX; and Naval Station Guantanamo Bay, Cuba. The total estimated value of the bridge is [illegible] and the required delivery date for services is 30 March 2016.

__X__ Specific characteristics of the service that limit the availability to a sole source (unique features, function of the item, etc.). Describe in detail why only this suggested source can furnish the requirements to the exclusion of other sources.

Services for the follow-on were to begin on 30 March 2016. On 12 February 2016, an interested party notified the Contract Specialist, Mr. Learie Holder, of legislation Section 898 in the 2016 National Defense Authorization Act (NDAA) that was recently signed into law by the President on 25 November 2015, authorizing non-profit organizations the opportunity to compete for religious related services on a United States military installation. As such, they requested the contracting department amend the solicitation immediately from a small business set-aside to an unrestricted procurement to be in compliance with the new legislation. The Contract Specialist subsequently informed the SBA Director and the Legal Counsel of recent legislation changes as discussed below.

The regional CREDO services contract is normally a small business set-aside. In Title VIII, Section 898 of the FY16 NDAA is the following language:

"The Department of Defense may not preclude a non-profit organization from competing for a contract for religious related services on a United States military installation."

The SBA regulations defining a business concern include a requirement to be "for profit" as stated in 13 CFR 121.105(a)(1). Accordingly, this raises an issue of whether the procurement should continue to be set-aside for small business or converted to a full and open procurement to allow a non-profit the opportunity to compete.

This issue is currently being reviewed at Navy and DOD levels for resolution and a common approach for all commands. Based on the change in law and the uncertainty it created with regard to the SBA regulations, a short term bridge contract is necessary. Once higher guidance is received from headquarters, the acquisition strategy can be adjusted, if necessary, and we can continue with the follow-on procurement.

In the interim, it is necessary to maintain the current contract coverage for the seven (7) designated locations that support the CREDO Southeast programs with Professional Facilitators necessary to meet the mission of strengthening Fleet, Fighter and Family. The request for a bridge is purely the result of the acquisition strategy challenge.

__X__ The requested material or service represents the minimum requirements of the government.

The mission of a CREDO Facilitator is to implement CREDO Southeast programs as professional facilitators, and assist CREDO staff in providing administrative support as necessary to meet its mission of strengthening Fleet, Fighter and Family. Efforts include, but are not limited to:

- Facilitate Core Programs, Core Plus Workshops, Core Plus, and Tone of the Force and other briefs;
- Conduct marketing and face-to-face meeting with military Commanders and leaders;
- Identify and develop additional capabilities and initiatives that can be delivered by CREDO;
- Make appropriate referrals to a Chaplain or other helping professionals;
- Collect data and use the Navy Chaplain Ministry Support Tool (NCMST) to capture measures of performance and measures of effectiveness regarding CREDO programs; and
- Collaborate with other helping professionals within the Navy system.

CHECK & FILL IN ALL APPLICABLE BLANKS BELOW

__X__ The service must be compatible in all aspects (form, fit and function) with existing systems presently installed/performing. Describe the equipment/function you have now and how the new item/service must coordinate, connect, or interface with the existing system.

These services are planned and implemented throughout the year, and are essential for the successful mission of Commander, Navy Region Southeast (CNRSE). These activities require the continuous support of the Facilitators. Without the seven civilian CREDO facilitators, CNRSE would not have the seven detachments at the seven Flagship chapels across the region; thus CNRSE facilitators would not be able to deliver CREDO products at the installations across the regions which are dependent on the seven civilian facilitators in partnership with the Command Chaplain and the regional CREDO Headquarters.

Full Armor Group Inc. can provide the required support, within the given timeframes, needed to ensure that CNRSE meets it mission. Given the unique nature of the required services and the short duration of the bridge, only the incumbent can continue to perform these services without causing immense disruption, unacceptable delay, added cost and duplication of effort.

____ A patent, copyright or proprietary data limits competition. The proprietary data is: N/A

____ These are "direct replacements" parts/components for existing equipment. N/A

__X__ Other information to support a sole source buy:

The acquisition strategy is a SAP Sole Source award to the incumbent Contractor. No future bridge actions are anticipated as the competitive follow-on contract is in process with performance under the follow-on contract anticipated on 01 June 2016.

I CERTIFY THAT STATEMENTS CHECKED, AND INFORMATION PROVIDED ABOVE, ARE COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT THE PROCESSING OF THIS SOLE SOURCE JUSTIFICATION PRECLUDES THE USE OF FULL AND OPEN COMPETITION.

Signature [redacted] Title [redacted]

Activity [redacted] Date [redacted]

Contracting Officer Signature [redacted]

Date [redacted]
SAP Sole Source